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17 Attorneys for Defendants CITY OF FOLSOM, JOSEPH HOWARD, BRIAN LOCKHART,  
18 ROMAN KEHM, ZACHARY WELLS, JOHN WAGNER, BRANDON MONSOOR, PAUL  
19 RICE, DEREK KOUPAL, MICHAEL AUSTIN, JOSHUA SENA, EATHAN VAVACK, JOHN  
20 MONIZ

21 UNITED STATES DISTRICT COURT  
22 EASTERN DISTRICT OF CALIFORNIA

23 GEORGE P. UMBERGER II, LISABETH A.  
24 KING, SAVANNAH R. BAILEY,

25 Plaintiffs,

26 v.

27 CITY OF FOLSOM, DETECTIVE JOSEPH  
28 HOWARD, COMMANDER BRIAN  
LOCKHART, SERGEANT ROMAN  
KEHM, SERGEANT ZACHARY WELLS,  
SERGEANT JOHN WAGNER,  
SERGEANT BRANDON MONSOOR,  
SERGEANT PAUL RICE, CORPORAL  
DEREK KOUPAL, OFFICER MICHAEL  
AUSTIN, OFFICER JOSHUA SENA,  
OFFICER EATHAN VAVACK, AND  
OFFICER JOHN MONIZ,

Defendants.

CASE NO. 2:24-CV-01169-KJM-JDP

**STIPULATION TO EXTEND TIME  
FOR DEFENDANTS TO RESPOND  
TO FIRST AMENDED COMPLAINT;  
ORDER**

FAC Filed: 12/04/2025

FAC Filed: 10/10/2025

Complaint Filed: 04/22/2024

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1 Plaintiffs George P. Umberger II, Lisabeth A. King, Savannah R. Bailey, and Defendants  
2 City of Folsom, Joseph Howard, Brian Lockhart, Roman Kehm, Zachary Wells, John Wagner,  
3 Brandon Monsoor, Paul Rice, Derek Koupal, Michael Austin, Joshua Sena, Eathan Vavack, John  
4 Moniz (“City Defendants”), by and through their respective undersigned counsel of record, hereby  
5 represent to the Court and stipulate as follows:

6 1. On December 4, 2025, Plaintiffs filed their First Amended Complaint. (ECF No. 29).

7 2. The First Amended Complaint added defendant Patrick Thibeault, summons of  
8 which was issued on December 8, 2025. (ECF No. 30). Service of summons has not yet been  
9 affected.

10 3. The City Defendants would otherwise be required to file a response to the First  
11 Amended Complaint on December 18, 2025.

12 4. The City Defendants have commenced the meet and confer process in accordance  
13 with the court’s standing order in an effort to avoid motion practice.

14 5. In the interests of reduced costs to the parties and judicial economy, and to allow  
15 additional time to meet and confer to the extent necessary, and to allow sufficient time for service  
16 of process on added defendant Patrick Thibeault, and to avoid duplicative filings in response to the  
17 First Amended Complaint, Plaintiffs have agreed to extend the time for all City Defendants to file  
18 responses to Plaintiffs’ First Amended Complaint on the same date.

19 6. The parties hereby stipulate and agree that City Defendants’ deadline to file a  
20 response to Plaintiffs’ First Amended Complaint shall be extended to January 16, 2026.

21 IT IS SO STIPULATED AND AGREED.

22  
23 Dated: December 16, 2025

**LAW OFFICE OF SAMUEL H. PARK, APC**

24  
25 By: /s/ Samuel H. Park (auth’d on 12/16/2025)

Samuel H. Park,

Attorney for Plaintiffs

George P. Umberger, II; Lisabeth A. King;

Savannah R. Bailey

1 Dated: December 22, 2025

**PORTER SCOTT**  
**A PROFESSIONAL CORPORATION**

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3 By /s/ John R. Whitefleet  
4 John R. Whitefleet  
5 Attorney for Defendants  
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**ORDER**

GOOD CAUSE APPEARING, Defendants' deadline to file a response to Plaintiffs' First Amended Complaint shall be extended to January 16, 2026.

DATED: December 22, 2025.

  

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UNITED STATES DISTRICT JUDGE